

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES  
(APWU/USPS-39 THROUGH 42)  
(April 16, 2012)**

The United States Postal Service hereby files this objection to the above-identified interrogatories of the American Postal Workers Union (APWU), AFL-CIO, filed on April 6, 2012.

The Postal Service has responded to discovery in this docket in a manner that has given parties the benefit of the doubt regarding whether the information sought through interrogatories could arguably lead to admissible evidence relevant to the question of whether the service changes under review in this docket comport with applicable service policies of title 39. The Postal Service's reward has been to receive the interrogatories below, which seek to abuse the discovery process in this docket in aid of the collective bargaining interests of an intervenor seeking data relevant to its desire to maximize employment opportunities for truck-driving members of the bargaining unit it represents.

On their face, the interrogatories listed below clearly seek no information relevant to the service changes at issue in this docket. Instead, they seek detailed information relevant to the administration of transportation contracts, to aid in a comparison of the costs of APWU Postal Vehicle Service (PVS)

transportation vs. private Highway Contract Route (HCR) transportation. While these interrogatories may be germane to APWU's interest in seeing postal management employ Postal Vehicle Service truck drivers represented by APWU to the extent required by the USPS-APWU collective bargaining agreement with APWU, they do not seek information relevant to the purposes of this docket. The interrogatories are stated verbatim and followed by additional, specific bases for the objection.

**APWU/USPS-39.** Provide a list of titles of postal personnel who are responsible for the procurement and management of HCR contracts and the number of people in those positions.

**APWU/USPS-40.** Provide the total number of annual hours associated with the network or transportation specialists and the network supply management personnel associated with oversight of the HCR contracts (in the continental U.S.). Under which LDCs are these hours counted? In which category or categories of personnel are these personnel shown in the National Payroll Summary?

**APWU/USPS-41.** Provide a list of all costs associated with HCR procurement.

The Postal Service acknowledges that the intervenors and the Commission have an interest in the general details regarding how the Postal Service will design its transportation network to support the rationalized processing network it intends to implement in connection with the service changes under review in this docket. However, the issue of whether such transportation will ultimately be provided by PVS or HCR service is tangential to this aspect of the Postal Service's direct case. Such decisions will be made on a consolidation-by-consolidation basis and will take into account the best interests of the Postal Service and the Postal Service's collective bargaining obligations.

The relative merits of PVS vs. HCR service are not necessary to determining whether the Postal Service's proposal is consistent with the applicable policies of title 39.

Interrogatories seeking such minutiae as the job titles of postal personnel who procure and manage HCR contracts for the Postal Service, and the cumulative workhours they devote to domestic surface transportation contract oversight reach even farther beyond the scope of this docket, and seek information that will provide no value to the Commission as it considers the Postal Service's Request. Such questions would be akin to asking for the job titles and workhours of postal personnel who administer and supervise PVS transportation (and respond to APWU grievances related thereto). The question of whether cost savings are an appropriate motivation for the pursuit of service changes under section 3661 can be answered in the absence of absolutely complete and totally perfect information about all administrative activity and costs that can arguably be associated with one form of truck transportation vs. another. Accordingly, the Postal Service objects to interrogatories APWU/USPS-39 through 41.

**APWU/USPS-42.** Provide the total number of HCR contracts currently in effect and the total number of miles and hours of operation associated with those contracts (in the continental U.S.).

This interrogatory is not designed to elicit meaningful information regarding the Postal Service's Request. The Postal Service has filed testimony and responses to interrogatories in this docket indicating which trips/routes are likely to comprise the Postal Service's rationalized transportation network.

Additionally, the Postal Service, through the Direct Testimony of Cheryl Martin, has indicated which of these trips/routes are serviced by PVS or HCR. In and of itself, the total number of HCR contracts that are currently in effect has no bearing on the Postal Service's direct case and it is difficult to determine how the disclosure of the additional information sought by this interrogatory would inform the Commission's opinion in this docket regarding whether the proposed service changes comport with applicable service policies of title 39.

Accordingly, the Postal Service also objects to interrogatory APWU/USPS-42.

Respectfully submitted,

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